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5 Counsel for Defendant ALONSO LOPEZ

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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA, ) No. CR 08-00603 JF  
12 Plaintiff, )  
13 v. ) **STIPULATION TO POSTPONE  
14 ALONSO LOPEZ, ) DEFENDANT'S SELF-SURRENDER  
15 Defendant. ) DATE; [PROPOSED] ORDER**  
16 \_\_\_\_\_)

17 Defendant and the government, through their respective counsel, hereby stipulate that,  
18 subject to the court's approval, the defendant's self-surrender date may be continued from April  
19 24, 2009 to May 22, 2009.

20 The postponement is requested because Mr. Lopez is attempting to establish a  
21 Forbearance Plan with respect to his home mortgage due to financial hardship. His goal is to  
22 modify or reduce the mortgage loan payments to ensure that his family will be able to remain in  
23 the family home while he is incarcerated. In order to set up a Forbearance Plan, the mortgage  
24 lender, Chase Home Finance, proposed terms including payment of a "down payment" and three  
25 "arrearage payments." At this time, defense counsel is informed that two of the arrearage  
26 payments remain due, and total \$1,600. The delay in Mr. Lopez's self-surrender is requested so

STIPULATION TO POSTPONE SELF-  
SURRENDER DATE; [PROPOSED] ORDER  
No. CR 08-00603 JF

1 that he can continue to work to earn money to pay the remaining \$1,600 requested by the lender  
2 before he is incarcerated.

3 A copy of the mortgage lender's letter to Mr. Lopez, outlining the above proposal, has  
4 been provided to government counsel.

5 For the foregoing reasons, the parties stipulate that Mr. Lopez's self-surrender date may  
6 be postponed to May 22, 2009.

7 Dated: 4/15/09 \_\_\_\_\_  
/s/  
LARA S. VENNARD  
Assistant Federal Public Defender

9 Dated: 4/15/09 \_\_\_\_\_  
/s/  
TOM O'CONNELL  
Assistant United States Attorney

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8 IN THE UNITED STATES DISTRICT COURT

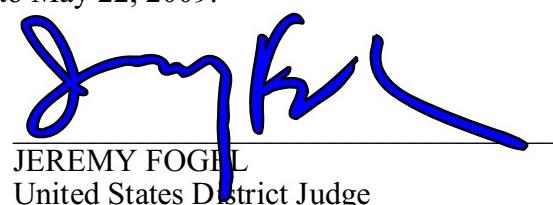
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA, ) No. CR 08-00603 JF  
12 Plaintiff, )  
13 v. )  
14 ALONSO LOPEZ, )  
15 Defendant. )  
16 \_\_\_\_\_)

17  
18 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the self-surrender date in  
19 this matter, presently April 24, 2009, be postponed to May 22, 2009.

20  
21 Dated: 4/20/09

  
22 JEREMY FOGEL  
United States District Judge

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SURRENDER DATE; [PROPOSED] ORDER  
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